

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Advanced Television Systems)	
and Their Impact upon the)	MM Docket No. 87-268
Existing Television Broadcast)	
Service)	
)	

To: The Commission

MEDIA GENERAL SUPPLEMENT TO PETITION FOR RECONSIDERATION

Media General, Inc., together with its wholly-owned subsidiaries, each a television station licensee (collectively, "Media General"), by its attorneys, and pursuant to the Commission's Order,^{1/} hereby supplements its June 13, 1997, Petition for Reconsideration ("Petition") of the *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*"), insofar as requesting adjustments to the DTV Table of Allotments. In the Petition, Media General stated its belief that, by allowing interested parties a brief additional comment period to provide a more thorough analysis, the Commission could more efficiently and expeditiously fix discrete problems in the DTV Table of Allotments than by reviewing a plethora of separate rulemaking petitions and notification applications after the DTV Table became final. Media General appreciates the opportunity offered by the Commission, and, accordingly, Media General is providing herewith supplemental information regarding three of its stations — WHLT-TV (Hattiesburg, MS),

^{1/} Advanced Television Systems, *Order*, MM Docket No. 87-268, DA 97-1377 (rel. July 2, 1997).

WBMG-TV (Birmingham, AL) and WTVQ-TV (Lexington, KY) — and requests modification of their respective DTV allotments.

I. ALLOTMENT ADJUSTMENTS

A. WHLT-TV — Hattiesburg, MS

In the *Sixth R&O*, the Commission proposed to allocate Channel 23 as WHLT-TV's paired DTV channel with an ERP at the minimum 50 kW. WHLT-TV currently broadcasts on NTSC Channel 22. Media General requests that the Commission reassign Channel 58 to WHLT-TV as its DTV allotment. As shown in the technical exhibit ("Attachment A"), operation on Channel 58 would create no new interference and would thus be in satisfaction of the Commission's criteria regarding modifications to the DTV Table.^{2/} While Media General recognizes that Channel 58 is not within the Commission's "core spectrum," Media General urges the Commission to allow broadcasters who wish to operate on non-core spectrum during the transition period to do so. In general, expanded use of the spectrum would help mitigate the interference problems existing throughout the country that will be created by the transition to digital television. DTV broadcasts on Channel 58 would avoid the potential problems associated with co-located adjacent channel operation faced by WHLT-TV and, as shown in the technical exhibit, allow the station to operate at the maximum permitted ERP of 1000 kW. Additionally, allowing WHLT-TV to determine for itself that it would prefer the out-of-core allotment is consistent with the notion of broadcaster choice that is at the nucleus of the free-market principles consistently relied upon by the Commission in

^{2/} *Sixth R&O* at ¶222.

the *Sixth R&O*. Accordingly, Media General requests that the Commission reassign DTV Channel 58 to WHLT-TV and authorize operation at 1000 kW ERP.

B. WBMG-TV — Birmingham, AL

WBMG-TV currently transmits its NTSC broadcasts on Channel 42 and was paired DTV Channel 30 with an authorized ERP of only 159 kW. Media General requests that the Commission reassign either Channel 62 or 65 to WBMG-TV as its DTV allotment. As shown in the technical exhibit (“Attachment A”), neither of these channels would create new interference and both would allow WBMG-TV to maximize facilities and operate at 1000 kW ERP.^{3/} Other channels were analyzed, but none allow the benefits offered by Channels 62 and 65. Media General is well aware that the Commission has identified these channels for early recovery and has attempted to minimize allotment of these frequencies. However, the Commission should also be aware of the disparity in authorized power between UHF stations and VHF stations allotted UHF-DTV channels.^{4/} At this stage of the proceeding, maximized facilities for UHF stations presents the best way to overcome the likelihood that viewers in exterior areas of the service contours will not receive UHF broadcasts (while higher-powered VHF stations would be received by simple set-top antennas). Furthermore, as previously noted, expanded use of the broadcast spectrum would help alleviate critical interference problems created by the addition of DTV allotments. For the foregoing reasons, Media

^{3/} Media General did identify the potential for intermodulation interference, but it believes that such interference will have little practical effect. See Attachment A.

^{4/} See Petition at 8-12.

General requests that the Commission reassign DTV Channel 62 or 65 to WBMG-TV and authorize operation at 1000 kW ERP.

C. WTVQ-TV — Lexington, KY

WTVQ-TV (NTSC Channel 36) was assigned DTV Channel 40 with an ERP of only 66.5 kW. Media General requests that the Commission reassign either Channel 62 or 65 to WTVQ-TV as its DTV allotment. As shown in the technical exhibit (“Attachment A”), neither of these channels would create new interference and both would allow WTVQ-TV to maximize facilities and operate at 1000 kW ERP. As with the circumstances in Birmingham, other channels were analyzed, but none allow the benefits offered by Channels 62 and 65. For the reasons described in the previous section, Media General requests that the Commission reassign DTV Channel 62 or 65 to WTVQ-TV, despite those channels’ designation for early recovery, and authorize operation at 1000 kW ERP.

CONCLUSION

For each of the modifications addressed here, Media General requests that the initial allotments, as provided in the *Sixth R&O*, be reserved until such time that the new allotments have been fully tested and the Commission has completely authorized operation of the channels without reservation. Media General understands that the Commission will want to thoroughly analyze each requested modification, given the concerns of interference “ripple,” and that the Commission will be hesitant, as a general proposition, to modify the DTV Table. Accordingly, while Media General is convinced of the meritorious nature of its suggested modifications, because of the uncertainty of the Commission’s treatment of

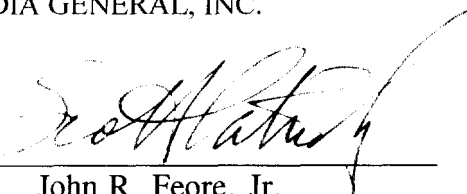
modifications to the Table, and the uncertainty associated with any new technology, Media General respectfully requests that the Commission refrain from reassigning the initial allotments until such time that Commission has removed any conditions on the operation of the channel and that Media General has tested full operation.

For the reasons stated in the foregoing, and as demonstrated in the attached technical exhibit, Media General requests that the Commission grant the requested modifications of the DTV Table.

Respectfully submitted,

MEDIA GENERAL, INC.

By:


John R. Feore, Jr.
Scott S. Patrick

Its Attorneys

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
202-776-2000

Dated: August 22, 1997

ATTACHMENT A

Technical Exhibit

ENGINEERING STATEMENT
IN SUPPORT OF THE SUPPLEMENTAL COMMENTS OF
MEDIA GENERAL, INC.
FOR RECONSIDERATION OF
THE FIFTH AND SIXTH REPORTS AND ORDERS
IN MM DOCKET NO. 87-268

August 22, 1997

Media General, Inc.
Tampa, Florida

Engineering Statement
in Support of the Supplemental Comments of
Media General, Inc.
for Reconsideration of
the Fifth and Sixth Reports and Orders
in MM Docket No. 87-268

The firm of Moffet, Larson and Johnson, Inc. (MLJ) has been retained by Media General, Inc. to make engineering studies in support of the Media General Supplemental Comments for Reconsideration of the Fifth and Sixth Reports and Orders in MM Docket No. 87-268. Media General filed a Petition for Reconsideration of the Fifth and Sixth Reports and Orders in MM Docket No. 87-268. In the Sixth Report, which was released on April 21, 1997, the Commission has assigned a digital television (DTV) channel to each television station. In addition to assigning channels, the Commission assigned operating facilities to the stations. A number of Media general stations were assigned ERP less than the maximum permitted for DTV operation on the assigned channel. The Media General petition contained engineering studies to determine the feasibility of increasing ERP of under powered stations. The studies showed that it would be feasible to increase ERP of a number of Media General stations to the maximum permitted. The studies indicated, however, that maximum power apparently cannot be achieved on the assigned channel for stations WTVQ, Lexington, Kentucky; WBMG, Birmingham, Alabama and WHLT, Hattiesburg, Mississippi.

Channel studies were conducted in Lexington, Birmingham and Hattiesburg to find channels that would permit maximum power DTV operation for stations WBMG, WTVQ and WHLT. The following paragraphs describe the channels proposed for assignment to Media General stations in each market. In addition to requesting changes to a new channel, alternate channels are suggested if the proposed assignment is unacceptable to the Commission. Whenever possible channels in the band from 60 through 69 inclusive are not requested to avoid conflict with the Commissions desire for early reallocation of these channels.

Lexington, Kentucky

There are no channels available out of the 60 to 69 band that appear to permit 1000 kW operation in Lexington. Channel 62 is allotted to Lexington for NTSC use and there are three pending applications for construction permit on this allotment. Grant of any of these applications requires waiver of the TV freeze order. The transmitting sites proposed in the application are less than the required cochannel distance separation from Cincinnati, Ohio. Table

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Arlington, VA 22201

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Tampa, Florida

1A is a distance separation study for operation on channel 62 at Lexington. As shown in Table 1A there are no cochannel or adjacent channel allocations violations for operation on channel 62 but there appear to be UHF "taboo" violations for channel separations of ± 3 and ± 5 channels (intermodulation taboo). The cochannel, adjacent channel and image taboo DTV distance separations are generally less restrictive than the corresponding analog separations.

However, the other DTV and analog taboo separations are inconsistent. The DTV allocations are based upon interference from one station of the pair to the other. For example, considering stations on channel 62 and 65 interference ratios were developed for interference from channel 62 to 65 and vice versa. However, in the case of two analog stations, the distance separations were derived to protect the service of other stations from third order intermodulation interference. Stations with weak signals in the vicinity of the interfering stations are particularly vulnerable to intermodulation interference. For example, stations on channels 62 and 65 can cause intermodulation interference to the reception of stations on 58, 59, 60, 67, 68, and 69. The intent of the 20 mile analog intermodulation separation is to minimize the area where both interfering signals, channels 62 and 65 in this example, are strong and most likely to cause interference. The DTV distance separation in the rules permits stations to locate within 15 miles of each other and even co-locate which is the worst case for intermodulation interference.

In other words, the DTV distance separations of the intermodulation taboos are inappropriate. There are no interference ratios in the rules for NTSC to NTSC taboo interference, however, there are such ratios in Appendix B of the Sixth Report. The ratio for NTSC to NTSC for a channel difference of -3 is 30 dB; the corresponding ratio for DTV to NTSC is 33 dB. Thus the interfering potential for equal power is 3 dB greater for DTV than for NTSC. However, the maximum permitted ERP for NTSC operation is 50000 kW whereas the maximum DTV ERP is 1000 kW, a difference of 7 dB or 4 dB greater than the difference in the interference ratios. In this case, the applicants for channel 62 propose 5000 kW ERP. Thus, it is reasonable to conclude that the interference potential of an analog station on channel 62 at Lexington is comparable to or greater than that of a channel 62 DTV station, particularly because NTSC stations generally would operate with higher power than would DTV stations.

As alternate to channel 62, Media General requests the assignment of channel 66. Table 1B is a distance separation study for operation on channel 66 at the WTVQ site.

Birmingham

There are no channels available out of the 60 to 69 band that appear to permit 1000 kW operation in Birmingham. Our studies show that WBMG may operate on either Channels 62 and 65 with maximum ERP in Birmingham. These channels have only minor taboo interference

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problems similar to those described above for WTVQ in Lexington. To use either channel vacant ETV allotments would have to be deleted as envisioned by the FCC in the Sixth Report. Distance separation studies are shown in Tables 2A and 2B


Hattiesburg

Channel 58 is the best choice; this channel is not in the band proposed for early reallocation and there is little or no potential for interference to television service. Table 3A is a distance separation study for DTV at the WHLT site. Table 3A shows that there is a second adjacent channel (intermodulation interference) application for a new station in Wiggins, Mississippi. Grant of this application would require a waiver of the freeze order since a site is proposed that is less than the NTSC co channel distance requirement from New Orleans. Thus, the station should not be protected from interference to DTV operations. Co channel station WAWD is authorized to operate at Fort Walton Beach Florida. Although the distance to WAWD exceeds the cochannel minimum distance, an interference study was completed to illustrate that the interference is not predicted. This study is shown in Figure 1. Tables 3B and 3C are distance separation studies for operation on channels 67 and 68, respectively. These channels could be used in full compliance with the distance separation requirements for new stations and thus should be acceptable for DTV use. Assignment of either of these channels is proposed if channel 58 is not acceptable.

Conclusions

Channels for DTV operation may be assigned to stations WTVQ, WBMG and WHLT that would permit DTV operation with the present maximum permitted ERP of 1000 kW for UHF channels. These channels are requested instead of the channels assigned by the Commission.

The undersigned certify that this statement and the attached figures were prepared by them or under their supervision.


Ann Gallagher
Senior Engineer

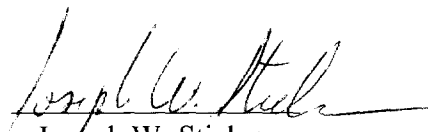
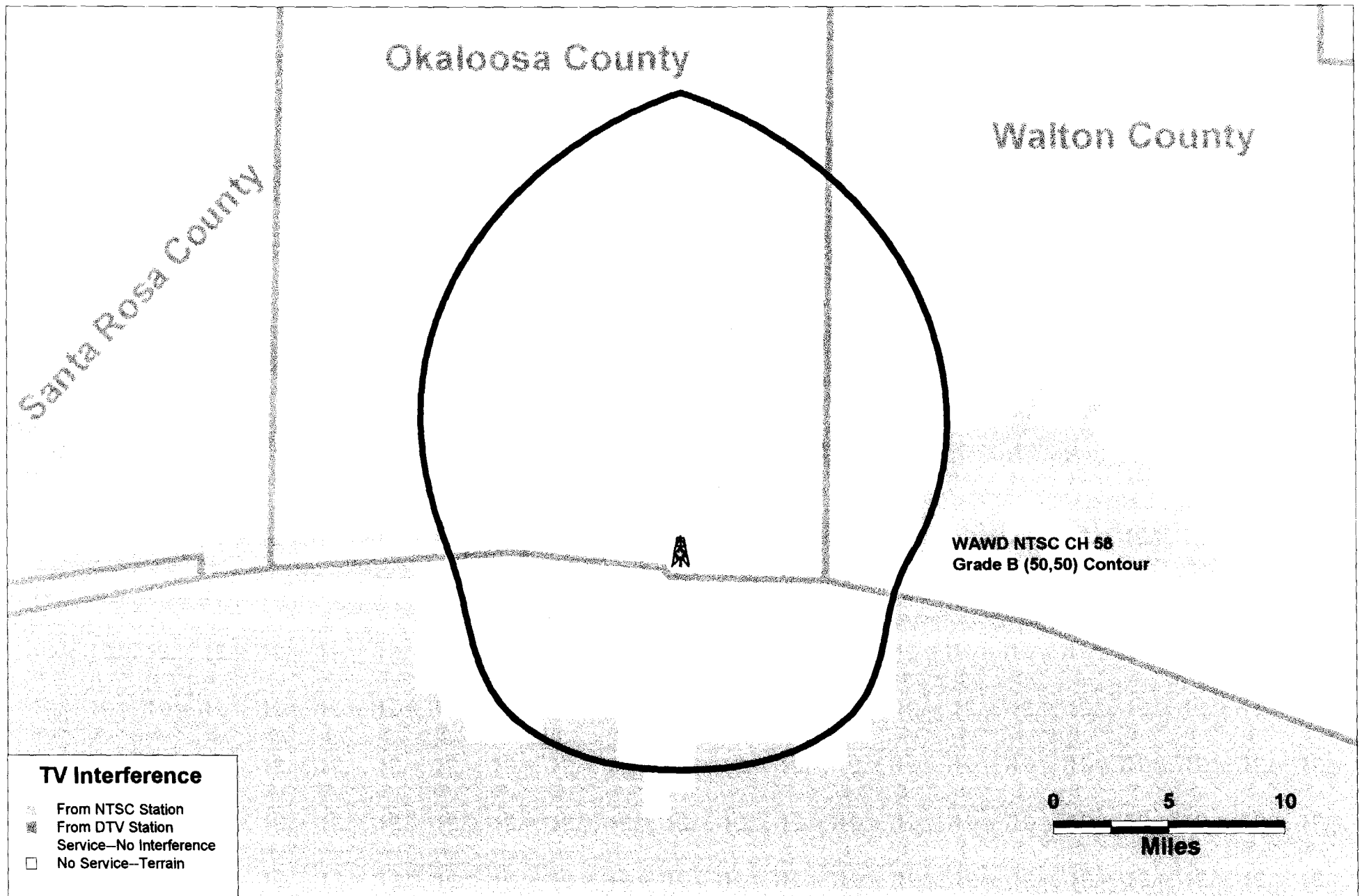

Joseph W. Stielper
Senior Engineer

FIGURE 1

Predicted Interference to WAWD NTSC CH 58 with WHLT DTV CH 58



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Table 1A

TV ALLOCATION SEPARATION REPORT

CallSign : WTVQ DTV
City : LEXINGTON, KY
Coordinates: 38 02 3.0 N
 : 84 23 39.0 W

Channel : 62
Zone : II

CallSign	Stat	Licensee	Chan	ERP-kw	Latitude	Bear	Notes
File-Number	City		Freq	HAAT-m	Longitude	Dist-km	Req-km Short-km
WCET	LIC	THE GREATER CINCINNATI	48I	2240.00	39 7 30.0N	354.8	CLOSE
BLET-740227KG		CINCINNATI, OH	675.3	327	84 31 18.0W	121.60	24.1 - 96.6
NEW	APP	MARRI BROADCASTING, L.P	62II	5000.00	38 1 49.0N	269.3	SHORT
BPCT-960920IM		LEXINGTON, KY	759.3	73	84 45 17.0W	31.66	244.6
NEW	APP	PAPPAS TELE OF AMERICA,	62II	5000.00	38 12 48.0N	286.6	SHORT
BPCT-960722KH		LEXINGTON, KY	759.3	610	85 10 16.0W	70.97	244.6
NEW	APP	TV CAPITAL CORPORATION	62II	5000.00	38 2 7.0N	271.4	SHORT
BPCT-960920WQ		LEXINGTON, KY	759.3	139	84 27 4.0W	5.00	244.6
WASVTV	LIC	PAPPAS TELECASTING OF T	62II	12.30	35 31 39.0N	148.2	CLEAR
BLCT-940509KE		ASHEVILLE, NC	759.3	338	82 29 44.0W	325.73	244.6
WLJCTV	LIC	HOOR OF HARVEST, INC.	65II	74.10	37 36 23.0N	127.3	
BLCT-870616KM		BEATTYVILLE, KY	777.3	206	83 41 16.0W	78.25	24.1 - 96.6
WAOM	CP	GARCIA COMMUNICATIONS	67II	5000.00	38 17 25.0N	71.8	
BPCT-840921LA		MOREHEAD, KY	789.3	250	83 22 56.0W	93.13	24.1 - 96.6
WAOM	APP	GARCIA COMMUNICATIONS	67II	398.00	38 10 38.0N	79.3	
BMPCT-960705KFMOREHEAD, KY			789.3	82	83 24 24.0W	88.06	24.1 - 96.6
14700 Alloc			69II	0.00	37 47 43.0N	100.3	CLEAR
-		PAINTSVILLE, KY	801.3	-264	82 48 5.0W	142.55	24.1 - 96.6

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Table 1B

TV ALLOCATION SEPARATION REPORT

CallSign : WTVQ DTV
City : LEXINGTON, KY
Coordinates: 38 02 3.0 N
 : 84 23 39.0 W

Channel : 66
Zone : II

CallSign File-Number	Stat City	Licensee City	Chan Freq	ERP-kw HAAT-m	Latitude Longitude	Bear Dist-km	Req-km	Notes Short-km
11227		Alloc	51II	0.00	37 28 8.0N	110.3		CLEAR
-		PIKEVILLE, KY	693.3	-347	82 30 54.0W	177.10	24.1	- 96.6
WKON	LIC	KENTUCKY AUTHORITY FOR	52II	676.00	38 31 32.0N	326.5		SHORT
BLET-830812KP		OWENTON, KY	699.3	227	84 48 40.0W	65.62	24.1	- 96.6
NEW	APP	TV CAPITAL CORPORATION	62II	5000.00	38 2 7.0N	271.4		CLEAR
BPCT-960920WQ		LEXINGTON, KY	759.3	139	84 27 4.0W	5.00	24.1	- 96.6
NEW	APP	PAPPAS TELE OF AMERICA,	62II	5000.00	38 12 48.0N	286.6		SHORT
BPCT-960722KH		LEXINGTON, KY	759.3	610	85 10 16.0W	70.97	24.1	- 96.6
NEW	APP	MARRI BROADCASTING, L.P	62II	5000.00	38 1 49.0N	269.3		SHORT
BPCT-960920IM		LEXINGTON, KY	759.3	73	84 45 17.0W	31.66	24.1	- 96.6
WLJCTV	LIC	HOUR OF HARVEST, INC.	65II	74.10	37 36 23.0N	127.3		SHORT
BLCT-870616KM		BEATTYVILLE, KY	777.3	206	83 41 16.0W	78.25	9.7	- 88.5
WJFB	CP	BRYANT COMMUNICATIONS,	66II	2240.00	36 9 13.0N	220.7		CLEAR
BPCT-900308KG		LEBANON, TN	783.3	161	86 22 46.0W	273.33	244.6	
WJFB	LIC	BRYANT COMMUNICATIONS,	66II	251.00	36 9 13.0N	220.7		CLEAR
BLCT-900227KF		LEBANON, TN	783.3	161	86 22 46.0W	273.33	244.6	
14167		Alloc	66*I	0.00	39 55 38.0N	13.3		
-		SPRINGFIELD, OH	783.3	-310	83 48 29.0W	216.20	244.6	SHORT
WAOM	APP	GARCIA COMMUNICATIONS	67II	398.00	38 10 38.0N	79.3		SHORT
BMPCT-960705KFMOREHEAD, KY			789.3	82	83 24 24.0W	88.06	9.7	- 88.5
WAOM	CP	GARCIA COMMUNICATIONS	67II	5000.00	38 17 25.0N	71.8		CLOSE
BPCT-840921LA		MOREHEAD, KY	789.3	250	83 22 56.0W	93.13	9.7	- 88.5

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Table 2A

TV ALLOCATION SEPARATION REPORT

CallSign : WBMG DTV
City : BIRMINGHAM, AL
Coordinates: 33 29 2.0 N
 : 86 48 21.0 W

Channel : 62
Zone : II

CallSign	Stat	Licensee	Chan	ERP-kw	Latitude	Bear	Notes
File-Number		City	Freq	HAAT-m	Longitude	Dist-km	Req-km Short-km
WAFF	LIC	AFLAC BROADCAST GROUP,	48II	1170.00	34 42 39.0N	10.3	CLEAR
BLCT-800724KI		HUNTSVILLE, AL	675.3	578	86 32 7.0W	138.37	24.1 - 96.6
WTJP	LIC	ALL AMERICAN NETWORK	60II	5000.00	33 48 53.0N	41.9	SHORT
BLCT-860731KP		GADSDEN, AL	747.3	339	86 26 55.0W	49.44	24.1 - 96.6
13428	ALLOC		62II	0.00	33 31 1.0N	354.0	SHORT
-		BIRMINGHAM, AL	759.3	-189	86 48 36.0W	3.69	244.6
13622	ALLOC		63III	0.00	32 22 54.0N	159.1	CLEAR
-		MONTGOMERY, AL	765.3	-55	86 18 30.0W	130.79	9.7 - 88.5

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Table 2B

TV ALLOCATION SEPARATION REPORT

CallSign	:	WBMG DTV	Channel	:	65
City	:	BIRMINGHAM, AL	Zone	:	II
Coordinates:	:	33 29 2.0 N			
	:	86 48 21.0 W			

CallSign	Stat	Licensee	Chan	ERP-kw	Latitude	Bear	Notes
File-Number		City	Freq	HAAT-m	Longitude	Dist-km	Req-km Short-km
NEW	APP	UNITED TELEVISION, INC.	50II	5000.00	32 38 33.0N	122.2	CLEAR
BPCT-960920IR		OPELIKA, AL	687.3	195	85 14 13.0W	173.71	24.1 - 96.6
11264ADD	ADD	PELICAN BROADCASTING CO	51II	0.00	33 5 51.0N	190.8	SHORT
-		CENTER POINT, AL	693.3	-159	86 53 38.0W	43.63	24.1 - 96.6
13428			62II	0.00	33 31 1.0N	354.0	CLEAR
-		BIRMINGHAM, AL	759.3	-189	86 48 36.0W	3.69	24.1 - 96.6
14068			65II	0.00	34 0 48.0N	67.2	CLEAR
-		CEDARTOWN, GA	777.3	-277	85 15 18.0W	155.23	244.6
WABM	LIC	BIRMINGHAM (WABM-TV)	68II	1450.00	33 27 37.0N	238.5	CLEAR
BLCT-860210KF		BIRMINGHAM, AL	795.3	312	86 51 7.0W	5.02	24.1 - 96.6
WABM	CP	BIRMINGHAM (WABM-TV)	68II	5000.00	33 27 37.0N	238.5	CLEAR
BPCT-950630KF		BIRMINGHAM, AL	795.3	312	86 51 7.0W	5.02	24.1 - 96.6

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Tampa, Florida

Table 3A

TV ALLOCATION SEPARATION REPORT

CallSign	: WHLT DTV					Channel	: 58		
City	: HATTIESBURG, MS								
Coordinates:	31 24 20.0 N					Zone	: III		
	: 89 14 13.0 W								
CallSign	Stat	Licensee	Chan	ERP-kw	Latitude	Bear		Notes	
File-Number		City	Freq	HAAT-m	Longitude	Dist-km	Req-km	Short-km	
WDSU	DTV	WDSU TELEVISION, INC.	43III	1000.00	29 57 1.0N	203.3		CLEAR	
BMLCT-820420	KEN	NEW ORLEANS, LA	83.3	295	89 57 28.0W	175.50	24.1	- 96.6	
9944			43III	0.00	30 51 24.0N	171.1		SHORT	
-		WIGGINS, MS	645.3	-58	89 8 12.0W	61.60	24.1	- 96.6	
NEW	APP	MARRI BROADCASTING, L.P	51II	1510.00	32 16 53.0N	314.5		CLEAR	
BPCT-960920	LT	JACKSON, MS	693.3	295	90 17 41.0W	139.48	24.1	- 96.6	
NEW	APP	FANT BROADCAST DEVELOPM	51II	5000.00	32 17 44.0N	316.4		CLEAR	
BPCT-960722	KJ	JACKSON, MS	693.3	180	90 14 44.0W	137.30	24.1	- 96.6	
NEW	APP	WINSTAR BROADCASTING CO	51II	5000.00	32 41 25.0N	337.6		CLEAR	
BPCT-961001	UU	JACKSON, MS	693.3	559	89 52 6.0W	154.43	24.1	- 96.6	
NEW	APP	EDWARD I. ST. PE	51II	5000.00	32 33 55.0N	328.5		CLEAR	
BPCT-960711	LI	JACKSON, MS	693.3	146	90 4 51.0W	151.32	24.1	- 96.6	
NEW	APP	KM COMMUNICATION, INC.	51II	5000.00	32 38 31.0N	332.1		CLEAR	
BPCT-960930	LW	JACKSON, MS	693.3	306	90 0 59.0W	155.62	24.1	- 96.6	
NEW	APP	KB COMMUNICATIONS CORPO	51II	5000.00	32 41 25.0N	337.6		CLEAR	
BPCT-960710	KY	JACKSON, MS	693.3	555	89 52 6.0W	154.43	24.1	- 96.6	
NEW	APP	GEORGE S. FLINN, JR.	51II	724.00	32 16 53.0N	314.5		CLEAR	
BPCT-961001	UV	JACKSON, MS	693.3	377	90 17 41.0W	139.48	24.1	- 96.6	
NEW	APP	NATCHEZ TRACE BROADCAST	51II	5000.00	32 36 51.0N	331.5		CLEAR	
BPCT-960710	KU	JACKSON, MS	693.3	229	90 1 0.0W	152.93	24.1	- 96.6	
NEW	APP	UNITED TELEVISION, INC.	51II	5000.00	32 14 26.0N	310.4		CLEAR	
BPCT-961001	UW	JACKSON, MS	693.3	371	90 24 15.0W	144.17	24.1	- 96.6	
WLBTTV	DTV	TV-3, INC.	51II	1000.00	32 12 46.0N	310.0		CLEAR	
BLCT-800115	KI	JACKSON, MS	61.3	533	90 22 54.0W	140.57	24.1	- 96.6	
NEW	APP	KB COMMUNICATIONS CORPO	56III	5000.00	31 7 9.0N	230.9		SHORT	
BPCT-960920	LV	WIGGINS, MS	723.3	609	89 38 49.0W	50.33	24.1	- 96.6	
WAWD	CP	RAINBOW 58 BROADCASTING	58III	138.00	30 23 43.0N	112.6		CLEAR	
BMPCT-930709	KE	FORT WALTON BEACH, FL	735.3	57	86 30 11.0W	284.36	244.6		
WAWD	APP	RAINBOW 58 BROADCASTING	58III	138.00	30 23 49.0N	112.6		CLEAR	
BMPCT-941223	KE	FORT WALTON BEACH, FL	735.3	54	86 30 27.0W	283.90	244.6		

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Media General, Inc.
Tampa, Florida

Table 3B

TV ALLOCATION SEPARATION REPORT

CallSign : WHLT DTV
City : HATTIESBURG, MS
Coordinates: 31 24 20.0 N
 : 89 14 13.0 W

Channel : 67
Zone : III

CallSign	Stat	Licensee	Chan	ERP-kw	Latitude	Bear	Notes
File-Number	City		Freq	HAAT-m	Longitude	Dist-km	Short-km
WJTV	DTV	ELCOM OF MISSISSIPPI, I	52II	1000.00	32 14 26.0N	310.4	CLOSE
BMLCT-850919KV	JACKSON, MS		201.3	493	90 24 15.0W	144.17	119.90
WRJMTV	CP	STATE DOOR DEVELOPMENT,	67III	1260.00	31 58 32.0N	76.9	CLEAR
BMPCT-930525K	KETROY, AL		789.3	592	86 9 46.0W	298.24	244.6
WRJMTV	APP	STATE DOOR DEVELOPMENT,	67III	2820.00	32 3 37.0N	76.0	CLEAR
BMPCT-960131K	KETROY, AL		789.3	329	85 57 2.0W	319.79	244.6

MLJ MOFFET, LARSON & JOHNSON, INC. CONSULTING TELECOMMUNICATIONS ENGINEERS

ENGINEERING REPORT

1110 N. Glebe Road, Suite 800

Arlington, VA 22201

Media General, Inc.
Tampa, Florida

Table 3C

TV ALLOCATION SEPARATION REPORT

CallSign : WHLT DTV
City : HATTIESBURG, MS
Coordinates: 31 24 20.0 N
: 89 14 13.0 W

Channel : 68
Zone : III

CallSign	Stat	Licensee	Chan	ERP-kw	Latitude	Bear	Notes
File-Number	City	Freq	HAAT-m	Longitude	Dist-km	Req-km	Short-km
WUPL	LIC	CORNERSTONE, INC.	54III	4370.00	30 17 8.0N	207.3	CLEAR
BLCT-950530KE	SLIDELL, LA	711.3	216	89 54 18.0W	139.65	24.1	- 96.6
13217	ALLOC		61III	0.00	30 41 18.0N	124.7	CLEAR
-	MOBILE, AL	753.3	-5	88 2 36.0W	138.94	24.1	- 96.6
NEW	APP	FANT BROADCAST DEVELOPM	61III	5000.00	30 37 38.0N	119.0	CLEAR
BPCT-960722KQ	MOBILE, AL	753.3	346	87 37 31.0W	176.44	24.1	- 96.6
NEW	APP	MARRI BROADCASTING, L.P	61III	1510.00	30 44 44.0N	123.7	CLEAR
BPCT-960725LB	MOBILE, AL	753.3	137	88 5 40.0W	131.31	24.1	- 96.6
NEW	APP	TELEVISION CAPITOL CORP	61III	5000.00	30 40 55.0N	120.6	CLEAR
BPCT-960920WX	MOBILE, AL	753.3	307	87 49 41.0W	156.61	24.1	- 96.6
WABM	LIC	BIRMINGHAM (WABM-TV) LI	68II	1450.00	33 27 37.0N	43.8	CLEAR
BLCT-860210KF	BIRMINGHAM, AL	795.3	312	86 51 7.0W	319.73	244.6	
WABM	CP	BIRMINGHAM (WABM-TV) LI	68II	5000.00	33 27 37.0N	43.8	CLEAR
BPCT-950630KF	BIRMINGHAM, AL	795.3	312	86 51 7.0W	319.73	244.6	